

**Before the Hearing Panel
at Wellington**

UNDER the Resource Management Act 1991 (**RMA**)

IN THE MATTER OF Proposed Natural Resources Plan for the Wellington
Region (Hearing Stream 3)

**JOINT MEMORANDUM OF COUNSEL
HEARING STREAM 3 – WATER ALLOCATION**

Dated: 17 August 2017

Counsel instructed

For the Wellington Fish and Game Council:
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1. This Memorandum seeks a one week extension of the date for filing planning evidence on the 'Water Allocation' topic by Rangitāne Tū Mai Rā Trust ("the Trust"), the Wellington Fish and Game Council and the Minister of Conservation. These three parties have sought to be heard on Hearing Stream 3 in the week commencing 11 September 2017. These parties seek to file their expert planning evidence by 5.00 pm Monday 28 August 2017.
2. The original submissions/further submissions of the Trust, the Wellington Fish and Game Council and the Minister of Conservation all indicated that if others made similar submissions, consideration would be given to presenting a joint case with them at the hearing.
3. The Trust, the Wellington Fish and Game Council and the Minister of Conservation propose to align their planning evidence where appropriate and present separate but co-ordinated cases. For this reason, the three parties have sought to be heard in a block. The parties consider that it will assist the Panel if any amendments sought to the planning provisions for Hearing Stream 3 can, where possible, be jointly put forward by them. This will avoid the Panel needing to consider slightly different wording proposals by parties that are essentially seeking the same outcome. The extension is sought to enable time for consideration of wording proposals against the scope and intent of their respective submissions.
4. It is respectfully submitted that the delay is unlikely to prejudice any other party. The evidence will still be pre-circulated within the two weeks prior to the hearing of the case for these parties and is likely to be of lesser volume than if the three parties had entirely separate planning evidence on this topic.
5. This request only relates to planning evidence for the Water Allocation component. Planning and expert evidence for the Natural Form and Function topic (also Hearing Stream 3) will be filed within the current pre-circulation date of 22 August 2017.

DATED this day of August 2017



Ms S Ongley

**On behalf of the Wellington Fish and
Game Council**



Ms K Anton

**On behalf of the Minister of
Conservation**



Ms R Siciliano

On behalf of Rangitāne Tū Mai Rā Trust